

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CUONG MACH BINH TIEU,
a/k/a Steve, Hak Se Wui, Ah Keung,
LAP THE CHUNG,
a/k/a Lap Gor, Larry,
BOB YUEN,
a/k/a Ah Buk, Buk Fung Loh,
DING LIN,
a/k/a Jeffrey, Phi, Bald Headed Guy,
SKYLER CHANG,
a/k/a Long Hair,
CHEA BOU,
BAO HUNG PHUNG,
a/k/a Ah Bao, Monkey Face,
MAY CHUNG,
THANH THE CHU,
a/k/a Sai Sing,
HUNG TIEU,
a/k/a Dave, Ah Hung,
KWAI PING WONG,
a/k/a Sam,
JOHN HINYU CHEW,
BAO TRAN, and
BILLY KET CHAU,
a/k/a Tommy, Dei,

Defendants.

No. CR 11-0097 CRB

~~PROPOSED~~ PROTECTIVE ORDER

1 Upon agreement of the parties, the Court finds that there is good cause to enter a
2 protective order regarding the documents and materials that will be produced by the United
3 States to the defense counsel for Cuong Mach Bing Tieu and Skyler Chang (the defendants) as
4 discovery in this matter. Therefore, the Court hereby ORDERS:

5 The United States shall disclose to counsel for the defendants copies of cooperating
6 sources' plea agreements and agency reports from interviews with some of the cooperating
7 sources (collectively referred to as "cooperator materials"). The cooperator materials shall be
8 used by the defendants and their counsel only for the purposes of trial or assisting them with trial
9 preparation of this criminal case. The defendants and their counsel shall not, in the absence of a
10 further Court order, produce, reveal, or disclose the cooperator materials, or any portion thereof
11 or information contained therein, to any third party except as necessary for effective trial
12 preparation in this criminal action. In addition, the defendants and their counsel shall not make
13 direct or indirect use of the information contained in the cooperator materials in any other
14 proceeding. The cooperator materials shall not be copied at all unless copying is necessary for
15 preparation of the defense in this proceeding. Notwithstanding the foregoing, copies of the
16 cooperator materials may not be retained by any party (including the defendants) other than the
17 defendants' counsel without further order of the Court based upon a showing of good cause. Any
18 pleading that includes or makes reference to the cooperator materials shall be filed under seal.
19 All copies of the cooperator materials shall be returned to the government upon the conclusion of
20 this matter.

21
22 IT IS SO ORDERED.

23
24 Dated: Jan. 18, 2012

25 
26 HON. CHARLES R. BREYER
27 United States District Court Judge
28